



SIERRA CLUB  
CALIFORNIA

May 29, 2009

Mr. David Young  
National Environmental Policy Act (NEPA) Document Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630

Dear Mr. Young:

Sierra Club California is writing to comment on the proposed new Transmission Project of the Transmission Agency of Northern California (TANC)

We support the visionary and effective actions that our state is taking under AB32 and other laws and executive orders to promote cleaner energy. We strongly support the need to develop an increasingly higher percentage of renewable energy for our electricity portfolio. We also support the development of an energy-efficient and secure grid.

### **General Comments**

Moving renewable electricity from remote sites transmitted to load centers will require adequate transmission, and we do support more transmission capacity when needed for this purpose. However, Sierra Club California recommends that the evaluation of the need for proposed new transmission facilities and the design and evaluation of the facilities be consistent with the following guidelines:

1. Load forecasts should factor in the best available estimates of the future reduction in loads expected from energy efficiency programs and other demand reduction programs that are mandated by state regulations.
2. Alternative renewable resources that reduce the need for transmission should be considered. Distributed generation (DG) from a high volume of smaller, local generators such as roof mounted PV solar, concentrating solar, small wind, etc., are examples. These would be close to load and reduce the need for transmission capacity. They would also reduce electrical energy losses, line congestion and risk of grid failure. DG is a high priority under the state's "loading order" and should be promoted before long distance facilities.

3. There is considerable capacity to develop mid- and large-size renewable generation in the Central Valley near the load centers in Sacramento and other cities. Power generated near the load centers could potentially substitute for the generation served by the proposed transmission project. For example, lands in the Westlands Water District and vicinity are potentially suitable for large solar power projects.

Excessive selenium concentrations in the agricultural drainage water from this area are a very serious and as yet unsolved environmental problem. Converting agricultural lands in this area to solar power generation by technologies that use very little water would help to solve both climate and agricultural drainage crises.

4. Where transmission is determined to be necessary, we recommend that TANC follow the "Garamendi Principles" in planning transmission projects. The Garamendi Principles are findings to Senate Bill (SB) 2431 (Stats. 1988, ch. 1457), legislation regarding the role of transmission in California's future development. In the main part, the Garamendi Principles read:  
(b) The Legislature further finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:
  - A. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.
  - B. When construction of new transmission lines is required, encourage expansion of existing rights-of-way, when technically and economically feasible.
  - C. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.
  - D. Where there is a need to construct additional transmission, seek agreement among all interested utilities on the efficient use of that capacity.

### **Specific Comments**

We are also aware that PGE is proposing a transmission line along a corridor similar to the TANC proposal from Oregon, to Round Mountain to Collinsville. If both entities need new transmission capacity, then both could physically share the right-of-way but could potentially independently own specific lines and/or towers if that benefits each entity. The EIS/EIR must address the cumulative impacts of both of these proposals.

Should the case be made and an east/west alignment for Ravendale to Round Mountain is found to be necessary, the EIS/EIR must consider utilizing one corridor. While we respect the need to plan security for and redundancy in the electrical supply system, a much better way to do that is through promotion of local distributed generation. Adding unnecessary transmission redundancy can turn into a perverse incentive to build even more unnecessary remote generation as opposed to local generation, then making load centers even more vulnerable to grid failure.

The community of Round Mountain has suffered significant impacts from several existing power lines and an existing large substation. The siting of any additional transmission facilities in this vicinity must be justified by a thorough engineering, social, and environmental analysis. The analysis must include consideration of options which site the new substation outside the vicinity of Round Mountain and avoid constructing new lines in the area. Undergrounding new and existing lines in this area should also be considered.

As an alternative routing for at least some of the expected new renewable generation, TANC should also consider working with the State of Nevada and other agencies to consider a corridor along the eastern border of Nevada with California to bring renewable generation in Nevada down this corridor and then connecting to the existing Reno to Central Valley facilities.

The Central Valley is essential to migrating waterfowl, shorebirds and other wildlife. These proposed routes would affect as much as 35,000 acres of wetland including the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, and Yolo Basin Wildlife Area, the Upper Butte Basin, the Gray Lodge Wildlife Area, the Sutter National Wildlife Refuge and Llano Seco Unit of the Sacramento River National Wildlife Refuge.

We support the comments of the Yolo Basin Foundation. New power lines should avoid the Yolo Bypass Wildlife Area.

New power lines should avoid the Audubon Bobcat Ranch or other lands such as the Yolo Land and Cattle Company that have conservation easements. The Capay Valley is the heart of organic agriculture and should be avoided. It is also a gateway to the proposed Berryessa Snow Mountain National Conservation Area.

We concur with the comments of the Rumsey Band of the Wintun Tribe that all sacred sites must be avoided and support their section 106 consultation process.

## **Conclusion**

We urgently request that the Western Area Power Administration (WAPA), TANC, and TANC's member utilities work together to insure that the above guidelines for determining need and design of transmission facilities are followed and that a least environmentally damaging routing is adopted. Least environmentally damaging routings would use existing transmission right-of-ways to the greatest possible extent, thereby avoiding additional threats to critical wildlife habitats and protected areas.

In addition, as it is evident that both PGE and TANC must work together to minimize duplication of infrastructure and consequent environmental impacts in northern California. Decisions on who does what where should be coordinated, perhaps at the California Energy Commission.

Sincerely,

A handwritten signature in black ink that reads "Jim Metropulos". The signature is written in a cursive, flowing style.

Jim Metropulos  
Senior Advocate

Cc: SMUD Board of Directors